

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF WISCONSIN**

In re:	)	Case No. 24-20013-gmh
	)	Honorable G. Michael Halfenger
Jihan Consuelo Todorovich,	)	Chapter 13
	)	
Debtor,	)	<b>MOTION FOR CONFIRMATION</b>
	)	<b>OF NO AUTOMATIC STAY</b>
TitleMax of Wisconsin, Inc.,	)	<b>FILED BY TITLEMAX</b>
Movant,	)	
v.	)	
	)	
Jihan Consuelo Todorovich,	)	
	)	
Debtor,	)	
and	)	
Scott Lieske, Trustee,	)	
Respondents.	)	

COMES NOW TitleMax of Wisconsin, Inc. ("TitleMax") and requests, pursuant to 11 U.S.C. 362(c)(4), an order confirming that there is no automatic stay in effect. In support of that request, TitleMax states as follows:

1. On the date of this bankruptcy proceeding, TitleMax was owed at least \$4,107.46, secured by a 2011 Lincoln MKX, VIN: 2LMDJ6JK0BBJ04846. Copies of the documents which evidence the claim of TitleMax and its perfected security interest are attached as Exhibits A and B.

2. Debtor filed the present action on January 3, 2024.

Prepared by:  
Kathryn A. Klein  
Riezman Berger, P.C.  
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3. This is Debtor's 6<sup>th</sup> Chapter 13 filing since August 8, 2023, with the previous 5 cases being:

- a) Case 23-23549 filed on August 8, 2023, and dismissed for failure to file information on September 1, 2023;
- b) Case 23-24329 filed on September 22, 2023, and dismissed for failure to file information on October 12, 2023;
- c) Case 23-25156 filed on November 8, 2023, and dismissed for failure to file information on November 28, 2023; and
- d) Case 23-25502 filed on November 29, 2023, and dismissed for failure to file information on December 14, 2023.
- e) Case 23-25775 filed December 18, 2023, and dismissed for failure to file information on December 28, 2023.

4. TitleMax has not received a payment since July 7, 2023 and repossessed the vehicle on January 3, 2024, prior to receiving notice of this current bankruptcy proceeding.

5. Pursuant to 11 U.S.C. § 362(c)(4), no automatic stay is in effect.

WHEREFORE, TitleMax prays that the Court issue an Order confirming that there is no automatic stay in effect, and for such further relief as the Court deems proper.

Respectfully submitted,

Riezman Berger, P.C.

**/s/ Kathryn A. Klein**

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TitleMax of Wisconsin, Inc.,	)	
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Debtor,	)	
and	)	
Scott Lieske, Trustee,	)	
	)	
Respondents.	)	

**CERTIFICATE OF SERVICE OF MOTION  
TO CONFIRM NO AUTOMATIC STAY**

I certify that copies of the attached Motion to Confirm no Automatic Stay were served on the following parties via electronic using the CM/ECF system to the following on January 4, 2024:

Scott Lieske	Chapter 13 Trustee
P.O. Box 510920	
Milwaukee WI 53203	

Office of the United States Trustee  
517 E. Wisconsin Ave., Room 430  
Milwaukee, WI 53202

I further certify that a copy of the foregoing document was served on the following parties by sending postage prepaid, in the United States Mail, by first-class mail to the following on January 4, 2024:

Jihan Consuelo Todorovich	Debtor
5625 North 38th Street	
Milwaukee WI 53209	

**/s/ Kathryn A. Klein**